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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

CALISTA ENTERPRISES LTD, a
Republic of Seychelles Company,

Plaintiff,

vs.

TENZA TRADING LTD., a Cyprus
Company,

Defendant.

No. 3:13-cv-01045-SI

DECLARATION OF DEVON ZASTROW
NEWMAN IN SUPPORT OF DEFENDANT
TENZA TRADING LTD.'S MOTION FOR
PROTECTIVE ORDER REGARDING
CALISTA'S NOTICE OF FRCP 30(B)(6)
AND 45 DEPOSITION OF TENZA

I, Devon Zastrow Newman, declare that the following is true and correct:

1. I am one of the attorneys for Defendant, Tenza Trading Ltd. (“Tenza”) in the above-captioned case. I have personal knowledge of the facts and information set forth herein and if called as a witness I could and would testify accordingly. I make this declaration based upon my personal knowledge and belief in support of Defendant Tenza Trading Ltd’s Motion for Protective Order Regarding Calista’s Notice of FRCP 30(b)(6) and 45 Deposition of Tenza.

2. Attached as Exhibit A is a true and correct copy of the Notice of Deposition served by plaintiff Calista Enterprises, Ltd. (“Calista”).

3. Attached as Exhibit B is a true and correct copy of e-mail correspondence on January 23, 2014 from Paul Tauger on behalf of Tenza asserting preliminary objections to the noticed topics in Calista’s Notice to Tenza.

4. Attached as Exhibit C is a true and correct copy of the Amended Notice of Deposition served by Calista. For the Court’s convenience, Tenza submits the redlined version of the Amended Notice received by counsel that reflects all changes from the original Notice.

5. Attached as Exhibit D is a true and correct copy of e-mail correspondence on January 28, 2014 from Paul Tauger on behalf of Tenza requesting that Calista revise the Amended Notice to reflect the stipulation that was reached during the meet and confer on January 29, 2014.

6. Attached as Exhibit E is a true and correct copy of a Notice of Subpoena to Produce Documents, Information or Objects in a Civil Action Pursuant to Federal Rule of Civil Procedure 45 to GoDaddy.com, LLC, received from plaintiff Calista’s counsel on January 29, 2014.

7. Attached as Exhibit F is a true and correct copy of select pages of Calista Enterprises Ltd.’s Objections and Responses to Tenza Trading Ltd.’s First Set of Interrogatories from October 29, 2013.

8. Attached as Exhibit G is a true and correct copy of select pages of Tenza Trading

Ltd.'s Objections and Responses to Calista Enterprises Ltd.'s First Set of Interrogatories from January 20, 2014.

I hereby declare that the above statement, including information contained in the exhibits, is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury pursuant to the laws of the United States.

Dated this 30th day of January, 2014.

s/ Devon Zastrow Newman
Devon Zastrow Newman